

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TODD SZEWCZYK, *et al.*,

Plaintiffs,

v.

UNITED PARCEL SERVICE, INC.,

Defendant.

Case No. 2:19-cv-01109-JP

PLAINTIFFS' UNOPPOSED MOTION FOR APPROVAL OF SETTLEMENT¹

Plaintiffs, Todd Szewczyk and Jose Dones-Cruz (“Plaintiffs”), respectfully move this Court for entry of an Order:

- (1) approving the Settlement set forth in the Parties’ Settlement Agreement and Release (“Agreement”), attached as Exhibit A to the Declaration of Jason Conway;
- (2) approving the payment of attorneys’ fees and expenses to Plaintiffs’ Counsel;
- (3) dismissing this Action, with prejudice; and
- (4) retaining jurisdiction over this matter for three (3) months for the limited purpose of enforcing the Agreement.

The Settlement satisfies all criteria for approval of a Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.* collective action because it resolves a *bona fide* dispute among the Parties and was reached as a result of arm’s-length settlement negotiations conducted by counsel well-versed in employment law.

¹ Pursuant to the Court’s March 20, 2020 Order (ECF No. 23), Plaintiffs withdraw their previously filed Unopposed Motion for Approval of Settlement (ECF No 21), which included redacted versions of their Memoranda of Law and the Declaration of Jason Conway.

For the reasons outlined in the accompany Memorandum of Law, Plaintiffs respectfully request that the Court approve the settlement of this Action. A proposed Order is attached for the Court's consideration.

Dated: March 30, 2020
Philadelphia, Pennsylvania

Respectfully Submitted,

s/ Jason Conway
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that, on March 30, 2020, I caused a true and correct copy of the aforementioned document to be served on all counsel of record in this matter through operation of the Court's CM/ECF system.

s/ Jason Conway
Jason Conway